

Exhibit 4

RABINOWITZ, LUBETKIN & TULLY, LLC

293 Eisenhower Parkway, Suite 100

Livingston, N.J. 07039

(973) 597-9100

Jonathan I. Rabinowitz

Henry M. Karwowski

jrabinowitz@rltlawfirm.com

Attorneys for Debtors/Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

CUSTOM ALLOY CORPORATION, *et al.*,

Debtors.

Case Nos. 22-18143, 22-18144 (MBK)

Jointly Administered

Chapter 11

**AMENDED NOTICE OF POSSIBLE ASSUMPTION AND ASSIGNMENT OF CERTAIN
EXECUTORY CONTRACTS AND UNEXPIRED LEASES IN CONNECTION
WITH SALE OF SUBSTANTIALLY ALL OF THE DEBTORS' ASSETS**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. Custom Alloy Corporation, Chapter 11 Debtor-in-Possession in the above-captioned case, and CAC Michigan, LLC (collectively, the "Debtors"), its wholly owned subsidiary, seek to sell substantially all of their assets (the "Sale Assets") free and clear of any and all liens, claims, encumbrances, and interests.

2. On February 17, 2023, the Debtors filed with the United States Bankruptcy Court for the District of New Jersey a Motion for entry of an order pursuant to Bankruptcy Code sections 363 and 365 and Bankruptcy Rules 2002, 6004, and 6006 (1) approving bidding procedures for the sale of substantially all of the Debtors' assets (the "Bidding Procedures"); (2) scheduling (A) an auction sale and (B) a hearing (the "Sale Hearing") to consider approval of the highest and best offer for the assets; (3) approving procedures for the assumption and assignment of certain

executory contracts and unexpired leases (the "Assumption and Assignment Procedures"); (4) approving the form, manner, and sufficiency of notices relating to the sale and to the assumption and assignment of certain executory contracts and unexpired leases; (5) authorizing the Debtors to sell substantially all of its assets free and clear of liens, claims, encumbrances, and interests and to assume certain executory contracts and unexpired leases; and (6) granting related relief.

3. On February 27, 2023, the Bankruptcy Court entered an Order granting the Motion (the "Bidding Procedures Order").

4. Pursuant to the Bidding Procedures Order, the Debtors may seek to assume and assign the executory contracts and unexpired leases identified on **Exhibit 1** attached hereto (the "Assignment Schedule") in connection with the sale of the Sale Assets.

5. Any written request for Adequate Assurance Information (as defined in the Assumption and Assignment Procedures attached as **Exhibit 3** to the Bidding Procedures Order) must be promptly made to Rabinowitz, Lubetkin & Tully, LLC, 293 Eisenhower Parkway, Suite 100, Livingston, New Jersey 07039 (Attn: Jonathan I. Rabinowitz, Esq.) (jrabowitz@rltlawfirm.com), counsel for the Debtors, and it must (i) include an email address or mail address to which a response to such request can be sent, and (ii) confirm that the recipient will enter into a confidentiality agreement. Upon receiving such a request, the Debtors shall promptly provide such party with the Adequate Assurance Information.

6. Any objections to the assumption and assignment of any executory contract or unexpired lease identified on the Assignment Schedule, including, without limitation, any objection to the amount, if any, determined by the Debtors to be necessary to be paid to cure any default under such contract or lease (the "Cure Amount"), must be filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey, 402 East State Street, Trenton,

New Jersey 08608 and served on (i) counsel to the Debtors (Rabinowitz, Lubetkin & Tully, LLC, 293 Eisenhower Parkway, Suite 100, Livingston, New Jersey 07039 (Attn: Jonathan I. Rabinowitz, Esq.) (jrabinowitz@rtlawfirm.com)); (ii) counsel to CIBC (Goldberg Kohn, Ltd., 55 East Monroe, Suite 3300, Chicago, Illinois 60603 (Attn: Dimitri G. Karcazes, Esq.) (dimitri.karcazes@goldbergkohn.com) and Reed Smith LLP, 506 Carnegie Center, Suite 300, Princeton, New Jersey 08540 (Attn: Derek Baker, Esq.) (dbaker@reedsmith.com)); (iii) counsel to the Committee (Fox Rothschild LLP, 2000 Market Street, 20th Floor, Philadelphia, Pennsylvania 19103-3222 (Attn: Martha B. Chovanes) (mchovanes@foxrothschild.com)); and (iv) counsel to the United States Trustee (United States Department of Justice, Office of the United States Trustee, One Newark Center, Suite 2100, Newark, New Jersey 07102 (Attn: Maggie McGee, Esq.) (maggie.mcgee@usdoj.gov)).

7. Any objections to the Cure Amount and any other objections to the proposed assumption and assignment of an executory contract or unexpired lease, including any objection relating to adequate assurance of future performance, must be filed and served by not later than 5:00 p.m. (Eastern Standard Time) on April 19, 2023. This deadline supersedes any other deadline to the contrary in any other document, including the Bidding Procedures Order, the Bidding Procedures, and the Assumption and Assignment Procedures.

8. Unless a Non-Debtor Party (as defined in the Assumption and Assignment Procedures) timely objects, whether to a Cure Amount or on any other basis, the Non-Debtor Party shall be (i) deemed to have consented to the assumption and assignment of the applicable contract or lease and stipulated that the applicable Cure Amount as determined by the Debtors is correct and that the assurance of future performance is adequate; (ii) forever barred, estopped, and enjoined from objecting to the assumption and assignment of the assumed contract or lease, to the

applicable Cure Amount, or to the assurance of future performance; (iii) forever barred, estopped, and enjoined from asserting or claiming against the Debtors or the assignee that any additional amounts are due, that any defaults under the contract or lease exist, that conditions to assignment must be satisfied under such assumed contract or lease, that there is any objection or defense to the assumption and assignment of such assumed contract or lease, or that any required consent to the assignment has not been given; (iv) deemed to have agreed that from and after the date of assignment of the applicable contract or lease, the contract or lease will remain in effect; and (v) barred from asserting any other basis on which to object to the assumption and assignment.

9. If any Non-Debtor Party (as defined in the Assumption and Assignment Procedures) agrees with the Cure Amount identified on the Assignment Schedule and such party has no other objection to the sale or the potential assumption and assignment of its executory contract or unexpired lease, the Non-Debtor Party need not take any further action.

10. The Debtors reserve the right to supplement and modify the Assignment Schedule up to the close of the Auction; provided that if the Debtors add an executory contract or unexpired lease to the Assignment Schedule or modify the Cure Amount, the affected party shall receive a separate notice and an opportunity to object to such addition or modification.

RABINOWITZ, LUBETKIN & TULLY, LLC
Attorneys for Debtors/Debtors-In-Possession

By: /s/ Jonathan I. Rabinowitz
JONATHAN I. RABINOWITZ

Dated: March 30, 2023

EXHIBIT 1**AMENDED LIST OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES
THAT POTENTIALLY COULD BE ASSUMED AND ASSIGNED**

NAME OF NON-DEBTOR PARTY TO CONTRACT OR LEASE	ADDRESS OF NON-DEBTOR PARTY	CONTRACT OR LEASE AT ISSUE	PROPOSED CURE AMOUNT
1742 Square Associates, Ltd.	412 Trimmer Road Califon, NJ 07830	Lease of real property	\$685,090.63
ADP	5680 New Northside Drive, Atlanta GA 30328	Payroll processing agreement	\$0.0
Ally Bank	P.O. Box 380902 Minneapolis, MN 55438	Lease of truck	\$0.0
American Alloy Steel, Inc.	7721 Pinemont Drive P.O. Box 40469 Houston, TX 77210-0469	Purchase order (#209572) for raw material	\$0.0
American Alloy Steel, Inc.	7721 Pinemont Drive P.O. Box 40469 Houston, TX 77210-0469	Purchase order (#209672) for raw material	\$0.0
American Alloy Steel, Inc.	7721 Pinemont Drive P.O. Box 40469 Houston, TX 77210-0469	Purchase order (#209715) for raw material	\$0.0
American Alloy Steel, Inc.	7721 Pinemont Drive P.O. Box 40469 Houston, TX 77210-0469	Purchase order (#209734) for raw material	\$0.0
American Alloy Steel, Inc.	7721 Pinemont Drive P.O. Box 40469 Houston, TX 77210-0469	Purchase order (#209788) for raw material	\$0.0
American Alloy Steel, Inc.	7721 Pinemont Drive P.O. Box 40469 Houston, TX 77210-0469	Purchase order (#209790) for raw material	\$0.0
Amerigas Propane	P.O. Box 371473 Pittsburgh, PA 15250-7473	Contract for propane	\$18,156.89

ARS-ACP, LLC	P.O. Box 850327 Yukon, OK 73085-0327	Purchase order (#209622) for raw material	\$0.0
Badin Business Park, LLC	201 Isabella St. Pittsburgh, PA 15212	Lease of real property	\$0.0
Bank of the West	475 Sansome St. 19th Floor NC-TRI-19-A, San Francisco, CA 94111	Lease of welding robot	\$0.0
BB&T Commercial Equipment Capital Corp.	2 Great Valley Parkway, Suite 300 Malvern, PA 19355	Lease of WASP licenses	\$4,378.48
BMO Harris Bank	P.O. Box 71951 Chicago, IL 60694	Lease of flatbed trailer	\$0.0
CAN – Continental Insurance Company of New Jersey	151 North Franklin Street, Chicago, IL 60606	Fiduciary liability and crime insurance policy	\$0.0
Cena Fittings	Via G. Oberdan, 39 25128 Brescia, Italy	Purchase order (#209679) for raw material	\$0.0
Cena Fittings	Via G. Oberdan, 39 25128 Brescia, Italy	Purchase order (#209782) for raw material	\$0.0
Cigna Behavioral Health, Inc.	900 Cottage Grove Road, Bloomfield, CT 06002	Agreement for employee assistance program services	\$0.0
Cigna Health and Life Insurance Company	900 Cottage Grove Road, Bloomfield, CT 06002	Administrative services agreement	\$0.0
Cintas Corporation	P.O. Box 630910 Cincinnati, OH 45263-0910	Contract for uniforms	\$52,636.12
CIT Bank NA	10201 Centurian Parkway N #100 Jacksonville, FL 32256	Lease of Cisco Virtualization	\$0.0
CIT Bank NA	10201 Centurian Parkway N #100 Jacksonville, FL 32256	Lease of Cisco firewall	\$492.92
CIT Bank NA	10201 Centurian Parkway N #100 Jacksonville, FL 32256	Lease of WASP devices	\$2,658.07

Coalition Insurance Solutions, Inc.	55 2nd Street, Suite 2500, San Francisco, CA 94105	Cyber liability insurance policy	\$0.0
Constellation NewEnergy—Gas Division, LLC	9960 Corporate Campus Drive Suite 2000 Louisville, KY 40223	Natural gas supply agreement	\$8,693.97
Constellation NewEnergy, Inc.	900A Lake Street Suite 2 Ramsey, NJ 07446	Electricity supply agreement	\$0.0
Copley Consulting Group	42 Ladd Street, Suite 316, East Greenwich, RI 02818	Contract for upgrade and support for Cloud Suite Industrial	\$0.0
Corpac Steel Products Corp.	20803 Biscayne Blvd. Suite 502 Aventura, FL 33180	Purchase order (#209757) for raw material	\$0.0
Corpac Steel Products Corp.	20803 Biscayne Blvd. Suite 502 Aventura, FL 33180	Purchase order (#209783) for raw material	\$0.0
Dearing Compressor and Pump Co.	76 Aurora Industrial Parkway Aurora, OH 44202	Purchase order for air compressor	\$0.0
Dell Financial Services	P.O. Box 81577 Austin, TX 78708-1577	Lease of smartboard	\$0.0
Dell Financial Services	P.O. Box 81577 Austin, TX 78708-1577	Lease of smartboard	\$0.0
Edwards Business Systems	2240 City Line Road Bethlehem, PA 08017	Leases of printers and copiers	\$43,299.82
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#202915) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203065) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203149) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203177) for raw material	\$0.0

Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203349) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203614) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203727) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203801) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203803) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#203901) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#204294) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#204626) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#204828) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#204843) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#205039) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#205663) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#205668) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#208701) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#209522) for raw material	\$0.0

Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#209630) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#209690) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00010011) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00010536) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00012105) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00013415) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00013975) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00014026) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00014402) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#CA00014819) for raw material	\$0.0
Ellwood Quality Steels Co.	P.O. Box 360117 Pittsburgh PA 15251-6117	Purchase order (#209764) for raw material	\$0.0
Ellwood Specialty Steel	499 Honeybee Lane, New Castle, PA 16105	Purchase order (#205789) for raw material	\$0.0
ENGs Commercial Finance Co.	P.O. Box 128 Itasca, IL 60143- 0128	Lease of forklift truck	\$0.0
Erne Fittings USA, Inc.	520 Post Oak Blvd. Suite 710 Houston, TX 77027	Purchase order (#209583) for raw material	\$0.0
Federal Steel Supply, LLC	P.O. Box 844550 Boston, MA 02284- 4550	Purchase order (#209762) for raw material	\$0.0

Global Aerospace, Inc.	115 Tabor Road, Suite 3A, Morris Plains, NJ 07950	Aviation products liability policy	\$0.0
Great American Alliance Insurance Company – Strategic Comp	301 E. Fourth St., Cincinnati, OH 45202	Workers compensation – main insurance policy	\$0.0
Great American Alliance Insurance Company – Strategic Comp	301 E. Fourth St., Cincinnati, OH 45202	Workers compensation – Florida insurance policy	\$0.0
Great American Insurance Group	301 E. Fourth St., Cincinnati, OH 45202	Kidnap and ransom insurance policy	\$0.0
The Hartford – Trumbull Insurance Company	One Hartford Plaza, Hartford, CT 06155	Commercial automobile insurance policy	\$0.0
The Hartford	One Hartford Plaza, Hartford, CT 06155	Inland marine insurance policy	\$0.0
The Hartford	One Hartford Plaza, Hartford, CT 06155	Commercial property insurance policy	\$0.0
Infor Global Solutions, Inc.	13560 Morris Road, Suite 4100, Alpharetta, GA 30004	Contract for computer system licensing and maintenance	\$0.0
Insurance Company of the State of Pennsylvania – AIG World Risk	1271 Avenue of the Americas, FL 37, New York, NY 10020-1304	Insurance policy for foreign coverage	\$0.0
INVO8 International, Inc.	306 North Star Road Holmen, WI 54636	Purchase order for evaporator for clean room	\$0.0
Ironshore Specialty Insurance Group	175 Berkeley Street, Boston, MA 02116	EPIC Pac. general and poll liability insurance policy	\$0.0
Ironshore Specialty Insurance Group	175 Berkeley Street, Boston, MA 02116	Environmental excess liability insurance policy	\$0.0
Jacquet Mid Atlantic Inc.	500 Keystone Drive Limerick, PA 19468	Purchase order (#209736) for raw material	\$0.0
Jacquet Mid Atlantic Inc.	500 Keystone Drive Limerick, PA 19468	Purchase order (#209754) for raw material	\$0.0

Jacquet Mid Atlantic Inc.	500 Keystone Drive Limerick, PA 19468	Purchase order (#209791) for raw material	\$0.0
Lancaster & York	P.O. Box 163 Bloomfield Hills, MI 48303	Lease of real property to CAC Michigan, LLC	\$0.0
Langley Alloys Inc.	102 Longview St. Longview Business Park Conroe, TX 77301	Purchase order (#209796) for raw material	\$0.0
LEAF Capital Funding, LLC	1720A Crete St. Moberly, MO 65270	Lease of Hyster forklift trucks	\$0.0
LEAF Capital Funding, LLC	1720A Crete St. Moberly, MO 65270	Lease of LeBlond lathe	\$1,430.90
LEAF Capital Funding, LLC	1720A Crete St. Moberly, MO 65270	Lease of spectrometer	\$1,272.76
LEAF Capital Funding, LLC	1720A Crete St. Moberly, MO 65270	Lease of gray vertical lathe	\$1,953.45
Lines Insurance and Financial Services	555 College Road East, Princeton, NJ 08543-5241	Directors and officers and employment insurance policy	\$0.0
Matec Instrument Companies, Inc.	56 Hudson Street Northborough MA 01532-1922	Purchase order for automated ultrasonic immersion system	\$0.0
Midland States Bank	7700 Bonhomme Ave Suite 300 St. Louis, MO 63105	Lease of truck	\$3,272.35
Midland States Bank	7700 Bonhomme Ave Suite 300 St. Louis, MO 63105	Lease of forklift trucks	\$0.0
MJC Engineering and Technology, Inc.	15401 Assembly Lane Huntington Beach, CA 92649	Purchase order for F650,4000-4 Horizontal CNC Flow Forming Machine	\$0.0
National Tube Supply Co.	Dept. 10388 P.O. Box 87918 Chicago, IL 60680- 0618	Purchase order (#209743) for raw material	\$0.0
NetPrivateer	P.O. Box 449 Douglasville, PA 19518	Contract for Cisco hardware support	\$0.0
Penn Stainless Products Inc.	P.O. Box 9001 190 Kelly Road Quakertown, PA 18951-9001	Purchase order (#209661) for raw material	\$0.0

Penn Stainless Products Inc.	P.O. Box 9001 190 Kelly Road Quakertown, PA 18951-9001	Purchase order (#209774) for raw material	\$0.0
Pipe Distributors Inc.	P.O. Box 23237 Houston, TX 77228	Purchase order (#209712) for raw material	\$0.0
Pipe Distributors Inc.	P.O. Box 23237 Houston, TX 77228	Purchase order (#209784) for raw material	\$0.0
Prime Metals and Alloys	101 Innovation Drive Homer City, PA 15748-7433	Purchase order (#209446) for raw material	\$0.0
Prime Metals and Alloys	101 Innovation Drive Homer City, PA 15748-7433	Purchase order (#209612) for raw material	\$0.0
Prime Metals and Alloys	101 Innovation Drive Homer City, PA 15748-7433	Purchase order (#209657) for raw material	\$0.0
Prime Metals and Alloys	101 Innovation Drive Homer City, PA 15748-7433	Purchase order (#209775) for raw material	\$0.0
Republic Services	P.O. Box 9001099 Louisville, KY 40290-1099	Contract for dumpsters	\$1,818.05
Rolled Alloys Inc.	Dept. 33901 P.O. Box 67000 Detroit, MI 48267- 0339	Purchase order (#209405) for raw material	\$0.0
Rolled Alloys Inc.	Dept. 33901 P.O. Box 67000 Detroit, MI 48267- 0339	Purchase order (#209778) for raw material	\$0.0
Signature Vacuum Systems, Inc.	3982 Main Street Adamsville, PA 16110	Purchase order for vacuum furnace	\$0.0
Signature Vacuum Systems, Inc.	3982 Main Street Adamsville, PA 16110	Purchase order for chiller	\$0.0
Special Metals Corp.	3200 Riverside Drive Huntington WV 25705-1771	Purchase order (#209585) for raw material	\$0.0
Specialty Pipe & Tube	P.O. Box 532299 Atlanta, GA 30523- 2299	Purchase order (#209765) for raw material	\$0.0

Technoplast USA LLC	3619 West 73rd Street Suite 1 Anderson, IN 46011	Purchase order for pickle tank	\$0.0
Technoplast USA LLC	3619 West 73rd Street Suite 1 Anderson, IN 46011	Purchase order for ventilation for pickle tank	\$0.0
Travelers Casualty and Surety Company of America	P.O. Box 2950, Hartford, CT 06104-2950	Fiduciary liability and crime tail insurance policy	\$0.0
Valbruna Stainless Inc.	P.O. Box 83186 Chicago, IL 60691-0186	Purchase order (#209629) for raw material	\$0.0
Trimmer Road Company, LLC	412 Trimmer Road Califon, NJ 07830	Real property lease	\$392,550.16
Trimmer Road Company, LLC	412 Trimmer Road Califon, NJ 07830	Lease of equipment	\$0.0
US Bank Equipment Finance	1310 Madrid St. Marshall, MN 56258	Lease of boring mill	\$1,772.00
US Bank Equipment Finance	1310 Madrid St. Marshall, MN 56258	Lease of drop bottom furnace	\$0.0
US Bank Equipment Finance	1310 Madrid St. Marshall, MN 56258	Lease of machine and tooling	\$3,087.00
Washington AVCO	412 Trimmer Road Califon, NJ 07830	Lease of equipment	\$0.0

For those purchase orders for which the cure amount is designated as zero (0), the Debtors take the position that no default has occurred under the purchase order, and thus, that no cure is required.

The Debtors reserve the right to amend or supplement this Exhibit, including without limitation the right to add or remove executory contracts and unexpired leases, up and through the Sale Hearing, as that term is defined in the Bankruptcy Court's Order Approving Bidding Procedures and granting other relief.